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TRISTER, ROSS, SCHADLER & GOLD, PLLC

1666 CONNECTICUT AVENUE, N.W., FIFTH FLOOR

WASHINGTON, D.C. 20009

PHONE: (202) 328-1666

FAX: (202) 204-5946

www.tristerross.com

OFFICE OF GENERAL  
COUNSEL

KAREN A. POST  
Senior Counsel  
  
NEIL C. WEARE  
JOSEPH W. STEINBERG\*  
\*ONLY ADMITTED IN MINNESOTA  
  
DAVID M. WACHTEL\*  
Of Counsel  
\*ALSO ADMITTED IN  
CALIFORNIA AND MARYLAND  
  
Montana Office  
LAURA L. HOEHN\*  
Of Counsel  
\*ALSO ADMITTED IN CALIFORNIA

MICHAEL B. TRISTER  
GAIL E. ROSS  
B. HOLLY SCHADLER  
LAURENCE E. GOLD  
ALLEN H. MATTISON†  
†ALSO ADMITTED IN MARYLAND

July 25, 2016

Federal Election Commission  
Office of General Counsel  
999 E Street, NW  
Washington, D.C. 20436

Re: MUR 7081 - Response of Pride United Limited Partnership

Dear Sir or Madam:

This response to the complaint in this matter is submitted on behalf of Pride United Limited Partnership (hereinafter "Pride") pursuant to 11 CFR § 111.6. Pride requests that the Commission take no action in response to the complaint against it other than action dismissing the complaint. Alternatively, Pride requests that the Commission find no reason to believe that Pride has violated the Federal Election Campaign Act ("FECA") or any other statute or regulation over which the Commission has jurisdiction.

The lengthy complaint in this matter alleges that Rep. Patrick Murphy, Nicholas A. Mastroiani II, Floridians for a Strong Middle Class (hereinafter "FSMC") and other entities and individuals violated various provisions of FECA through a scheme orchestrated by Mastroiani to funnel money into Murphy's campaign for the United States Senate through shell companies and straw entities, including entities involving foreign nationals. The sole allegation in the complaint against Pride, however, is much narrower, consisting of a single sentence: "An entity by the name of Pride United Limited Partnership contributed \$20,000 to Murphy's Super Pac in December of 2015, but that entity was administratively dissolved in September 2015, before it contributed to Murphy's Super PAC." (Text at note 28 of the complaint; footnote omitted.)

In point of fact, Pride is a limited partnership established in December 1996 by the named partners in a West Palm Beach, Florida law firm in order to hold title to the office building in which the law firm is located. Pride's principal source of income is and has been rent paid by the law firm. While partners (and other employees) in the law firm frequently make contributions to federal, state and local candidates and committees from their personal funds, from time to time

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Pride's funds are used for such contributions, which is the case with respect to the \$20,000 contribution from Pride to FSMC. The source of Pride contributions always is, and in this case was, revenue received by Pride in the ordinary course of its long-standing business activities. It is not and has never been a shell company or straw entity.

The complaint in this case offers no factual basis for controverting or even questioning any of these facts. In particular, the complaint does not allege:

- that Pride or anyone associated with it has had any connection to Mr. Mastroiani or any of his business associates or entities, which in fact is not the case and would be emphatically denied under oath if it had been alleged;
- that Pride is a foreign national, which is not the case and would be emphatically denied under oath if it had been alleged;
- that Pride's partners are foreign nationals, which is not the case and would be emphatically denied under oath if it had been alleged;
- that Pride was established for the purpose of funneling funds to the Murphy campaign or to FSMC or to any other federal candidate, candidate committee or political committee, which is not the case and would be emphatically denied under oath if it had been alleged;
- that Pride received funds from any outside source for the purpose of making the contribution to FSMC, which is not the case and would be emphatically denied under oath if it had been alleged.
- that Pride's contribution to FSMC was an excessive contribution, which it was not because the recipient is registered as an independent expenditure only committee to which no contribution limits apply; see Speech Now v. FEC, 599 F. 3d 686 (D.C. Cir. 2010),

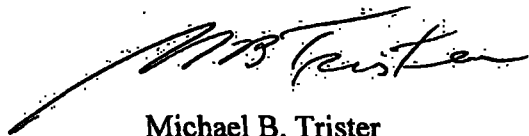
It is true, as alleged in the complaint, that Pride was administratively dissolved by the Florida Department of State on or about September 25, 2015. The administrative dissolution occurred because of a failure to file an annual report that was due in September, 2015. See Fla. Stats, § 620.1809(b). This is a frequent occurrence for many limited partnerships and other legal entities and is easily corrected by filing the delinquent report. Fla. Stats., § 620.1810. In this case, Pride was not aware of the dissolution, but immediately filed the delinquent report upon learning of the dissolution and has been reinstated. See Exhibit A. Under Florida law, this

Federal Election Commission  
Office of General Counsel  
July 25, 2016  
Page 3

reinstatement "relates back to and takes effect as of the effective date of the administrative dissolution, and the limited partnership may resume its activities as if the administrative dissolution had never occurred." Fla. Stats., § 620.1810(4). Thus, if the import of the allegations in the complaint is to suggest that Pride is a shell entity, nothing could be further from the truth - Pride is and remains a bona fide business entity.

For the foregoing reasons, therefore, the Commission should take no action other than to dismiss the complainant or, alternatively, find that there is no reason to believe that Pride violated any provision of FECA or any other statute or regulation within the jurisdiction of the Commission.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "M B Trister", written over a horizontal line.

Michael B. Trister  
B. Holly Schadler

Counsel for Pride United LP

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